

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re: Nina Mitchell, Debtor,	)	Case No.: 19-10981-elf Chapter 13
	)	
	)	
	)	
	)	
Kabe Capital, LLC	)	
Movant,	)	
	)	
v.	)	Judge Eric L. Frank
	)	
Nina Mitchell,	)	
Respondent.	)	

**CERTIFICATION OF NO OBJECTION REGARDING MOTION  
TO DEEM LATE FILED PROOF OF CLAIM AS TIMELY FILED**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion to Deem Late Filed Proof of Claim as Timely Filed, filed on October 29, 2020 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion to Deem Late Filed Proof of Claim as Timely Filed appears thereon. Pursuant to the Notice of Hearing, a response to Motion to Deem Late Filed Proof of Claim as Timely Filed was to be filed and served no later than November 17, 2020.

It is hereby respectfully requested that the Order attached to the Motion to Substitute Defendant be entered by the Court.

**SHNAYDER LAW FIRM, LLC**

Dated: November 23, 2020

By: /s/ Jennie Shnyder  
Jennie C. Shnyder, Esq., PA Bar ID# 315213  
148 East Street Road, Suite 352  
Feasterville, PA 19053  
Phone: 215-834-3103  
Fax: 215-565-2679  
[jennie@shnyderlawfirm.com](mailto:jennie@shnyderlawfirm.com)  
Attorney for Secured Creditor